

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

WILLIAM HUGHES

Criminal No. 18-46

**MOTION TO DIRECT THE UNITED STATES MARSHALS SERVICE  
TO TRANSFER FUNDS TO THE FEDERAL RESERVE/U.S. TREASURY**

AND NOW comes the United States of America by and through its attorneys, Cindy K. Chung, United States Attorney for the Western District of Pennsylvania and Lee J. Karl, Assistant United States Attorney for the Western District of Pennsylvania, and respectfully moves this Court to issue an order directing the United States Marshals Service to transfer funds to the Federal Reserve/United States Treasury to pay restitution for victims, and represents as follows:

1. On or around February 21, 2018, William Hughes was charged in the above-captioned case with conspiracy to commit an offense against the United States, or to defraud the United States (18 U.S.C. § 371).
2. On January 20, 2021, Hughes entered a guilty plea to Count One of the Indictment and also agreed to pay mandatory restitution to victims.
3. On July 20, 2021, the Court entered a Judgment in which William Hughes' interest in \$269,926.37 in United States currency, \$68,500.00 in United States currency, and \$415,529.37 in United States Currency, delineated by asset identification numbers 14-FBI-003051, 14-FBI-004692, and 14-FBI-003071 ("Subject Property") was forfeited to the United States.

4. The United States subsequently began ancillary forfeiture proceedings and provided notice of the forfeiture of the Subject Property so that third party interests could be adjudicated.

5. The United States advertised notice of this forfeiture proceeding via the government's forfeiture website. The United States filed a Declaration of Publication detailing the notice, the website and dates of advertising.

6. No claims have been filed with regard to the Subject Property, and the time to file claims has expired.

7. In addition to the criminal case, the United States also had a parallel civil case against Hughes at civil action number 14-1198 which was stayed pending the resolution of the criminal case.

8. The United States and Hughes also entered into a Settlement Agreement in May 2020, wherein both parties agreed that the Subject Property would be applied towards restitution pursuant to the Settlement Agreement.

9. The Subject Property is currently held in an asset forfeiture holding account that is controlled by the United States Marshals Service.

10. Accordingly, and pursuant to the global resolution of all matters, the United States respectfully requests that the Court issue an order directing the United States Marshals Service to transfer the Subject Property, by any reasonable means or manner, to the Federal Reserve/U.S. Treasury Department, 33 Liberty Street, New York, NY 10045, Account Number 15030001, in order for the Subject Property to be applied towards restitution pursuant to the Settlement Agreement.

WHEREFORE, the United States respectfully requests that this Honorable Court enter an Order directing the United States Marshals Service to transfer the Subject Property, by any reasonable means or manner, to the Federal Reserve/U.S. Treasury, 33 Liberty Street, New York, NY 10045, Account Number 15030001, to be applied to restitution.

Respectfully submitted,

CINDY K. CHUNG  
United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the United States' Motion to Direct the United States Marshals Service to Transfer Funds to the Federal Reserve/U.S. Treasury has been served through the electronic filing system this 11<sup>th</sup> day of March, 2022, upon the following:

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